

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: Sears Holdings Corporation

Case No.: 18-23538-rdd

Chapter 11

Debtor

-----X

KMart Holding Corporation

Adversary Proceeding No.: 20-06682
20-06570

Plaintiff

v.

Flynn Enterprises, LLC

Defendant

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MOTION FOR ADMISSION TO PRACTICE, *PRO HAC VICE*

I, Stephen M. Montgomery, request admission, *pro hac vice*, before the
Honorable Robert D. Drain, to represent Flynn Enterprises, LLC, a
defendant in the above-referenced ☐ case ☒ adversary proceeding.

I certify that I am a member in good standing of the bar in the State of
Tennessee and, if applicable, the bar of the U.S. District Court for the Middle
District of Tennessee.

I have submitted the filing fee of \$200.00 with this motion for *pro hac vice* admission.

Dated: Jan. 8, 2021

Nashville, Tennessee

/s/ Stephen M. Montgomery

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